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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric
Company (U902E) For Authority To
Update Marginal Costs, Cost Allocation And
Electric Rate Design.

Application 15-04-012
(Filed April 13, 2015)

**COMMENTS ON REVENUE ALLOCATION SETTLEMENT AGREEMENT BY
ALPINE SCHOOL DISTRICT, BONSALE UNIFIED SCHOOL DISTRICT, BORREGO
SPRINGS UNIFIED SCHOOL DISTRICT, CAJON VALLEY UNION SCHOOL DISTRICT,
CARDIFF SCHOOL DISTRICT, CARLSBAD UNIFIED SCHOOL DISTRICT, CHULA
VISTA ELEMENTARY SCHOOL DISTRICT, CORONADO UNIFIED SCHOOL
DISTRICT, DEHESA SCHOOL DISTRICT, DEL MAR UNION SCHOOL DISTRICT,
ENCINITAS UNION SCHOOL DISTRICT, ESCONDIDO UNION SCHOOL DISTRICT,
ESCONDIDO UNION HIGH SCHOOL DISTRICT, FALLBROOK UNION ELEMENTARY
SCHOOL DISTRICT, FALLBROOK UNION HIGH SCHOOL DISTRICT, GROSSMONT
UNION HIGH SCHOOL DISTRICT, JAMUL-DULZURA UNION SCHOOL DISTRICT,
JULIAN UNION SCHOOL DISTRICT, JULIAN UNION HIGH SCHOOL DISTRICT, LA
MESA-SPRING VALLEY SCHOOL DISTRICT, LAKESIDE UNION SCHOOL DISTRICT,
LEMON GROVE SCHOOL DISTRICT, MOUNTAIN EMPIRE UNIFIED SCHOOL
DISTRICT, NATIONAL SCHOOL DISTRICT, OCEANSIDE UNIFIED SCHOOL
DISTRICT, POWAY UNIFIED SCHOOL DISTRICT, RAMONA UNIFIED SCHOOL
DISTRICT, SAN DIEGO COUNTY OFFICE OF EDUCATION, SAN DIEGO UNIFIED
SCHOOL DISTRICT, SAN DIEGUITO UNION HIGH SCHOOL DISTRICT, SAN
MARCOS UNIFIED SCHOOL DISTRICT, SAN PASQUAL UNION SCHOOL DISTRICT,
SAN YSIDRO SCHOOL DISTRICT, SANTEE SCHOOL DISTRICT, SOLANA BEACH
SCHOOL DISTRICT, SOUTH BAY UNION SCHOOL DISTRICT, SPENCER VALLEY
ELEMENTARY SCHOOL DISTRICT, SWEETWATER UNION HIGH SCHOOL
DISTRICT, VALLEY CENTER-PAUMA UNIFIED SCHOOL DISTRICT, VISTA UNIFIED
SCHOOL DISTRICT AND WARNER UNIFIED SCHOOL DISTRICT**

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Dated: November 10, 2016

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**COMMENTS ON REVENUE ALLOCATION SETTLEMENT AGREEMENT BY
SAN DIEGO PUBLIC SCHOOLS**

Pursuant to CPUC Rules of Practice and Procedure 12.2, the Alpine School District, Bonsall Unified School District, Borrego Springs Unified School District, Cajon Valley Union School District, Cardiff School District, Carlsbad Unified School District, Chula Vista Elementary School District, Coronado Unified School District, Dehesa School District, Del Mar Union School District, Encinitas Union School District, Escondido Union School District, Escondido Union High School District, Fallbrook Union Elementary School District, Fallbrook Union High School District, Grossmont Union High School District, Jamul-Dulzura Union School District, Julian Union School District, Julian Union High School District, La Mesa-Spring Valley School District, Lakeside Union School District, Lemon Grove School District, Mountain Empire Unified School District, National School District, Oceanside Unified School District, Poway Unified School District, Ramona Unified School District, San Diego County Office of Education, San Diego Unified School District, San Dieguito Union High School District, San Marcos Unified School District, San Pasqual Union School District, San Ysidro School District, Santee School District, Solana Beach School District, South Bay Union School District, Spencer Valley Elementary School District, Sweetwater Union High School District, Valley Center-Pauma Unified School District, Vista Unified School District and Warner Unified School District (collectively, the “San Diego Public Schools” or “Public Schools”) hereby submit these comments in support of the proposed Revenue Allocation Settlement Agreement (“Revenue Allocation Settlement”).

The San Diego Public Schools have reached a tentative settlement with SDG&E on a number of issues that will be submitted shortly for Commission approval (“Schools Settlement”).

As outlined in the San Diego Public Schools' testimony, public schools in San Diego County have experienced energy cost increases of an average of over 40% since 2013, with some schools seeing over 70% increases in electricity bills.¹ As recognized by the Commission in prior proceedings, there are special circumstances associated with public schools, including their limited budget control and inability to change use patterns. The San Diego Public Schools have worked with SDG&E to reach a solution for schools that will provide meaningful mitigation to this rate shock and similar issues presented in the Revenue Allocation Settlement.² As a condition of the Schools Settlement, the Public Schools agree to support the Revenue Allocation Settlement.

Accordingly, the San Diego Public Schools support the Revenue Allocation Settlement and believe that it is reasonable in light of the whole record, consistent with law, and in the public interest. This determination is based on the assumption that the Schools Settlement will be approved by the Commission in full and without modification.

Respectfully submitted,

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¹ See Testimony of Lon W. House, Ph.D. for Public Schools, pp. 2-3.

² See D.15-08-040, p. 49 fn. 26.